



Continental Automated
Buildings Association

**Your Information
Source
for
Home & Building
Automation**

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Home & Building
Automation Association**

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**Before the
Federal Communications Commission
Washington DC 20554**

In the Matter of

Carrier Current Systems, Including
Broadband over Power Line Systems

ET Docket No. 03-104

Amendment of Part 15 Regarding New
Requirements and Measurement Guidelines
for Access Broadband over Power Line
Systems

ET Docket No. 04-37

**EX PARTE STATEMENT OF
CONTINENTAL AUTOMATED BUILDINGS ASSOCIATION**

October 6, 2004

CABA (Continental Automated Buildings Association) is a not-for-profit industry association that promotes advanced technologies for the automation of homes and building in North America. CABA's mission is to encourage the development, promotion, pursuit and understanding of integrated systems and automation in home and buildings.

CABA has nearly 400 member companies and its Web site is located at www.caba.org.

CABA is the definitive source for information about integrated systems and automation in home and buildings throughout North America. The association works to encourage the exchange of information with other organizations around the world. The organization offers a forum for industry discussion pertaining to home and building automation opportunities. CABA's online and print resources cover areas such as heating, ventilation, and air conditioning (HVAC), lighting, security, audio/video (A/V), communications technologies, energy management and controls. The organization provides and encourages industry research.

The CABA Standards Committee is a working group established within the CABA. One of key objectives is to facilitate and encourage industry-wide interoperability of protocols and standards.

The Standards Committee has discussed issues regarding Access BPL and its potential issues with home and building automation. The Committee has established the following consensus.

The Issue:

The latest FCC Notice of Proposed Rule Making (FCC 04-37) for Access Broadband over Power Line proposes that a new definition be added to section 15.3, and has requested comments on the definition.

15.3(ff) Access Broadband over power line (Access BPL): A carrier current system that transmits radio frequency energy by conduction over electric power lines owned, operated or controlled by an electric service provider. The electric power lines may be aerial (overhead) or underground.

Our position:

CABA Standards Committee believes that the new proposed definition 15.3(ff) is too broadly defined, includes devices and systems that were not intended to be included and fails to identify or characterize the major aspects of such a system, and therefore should be reworded.

Why?

For example, there are systems where controllable hot water heaters are installed in homes that may be temporarily interrupted for short periods of time. They are activated from a power utility during peak system loads. The messages can be sent through a WAN system such as RF to the homes. Through a router the message is then delivered over an in-house carrier current system.

Clearly this type of in-house carrier current system was not intended to be considered an Access BPL system, but according to the definition 15.3(ff) would be considered an Access BPL ("controlled by an electric service provider")

Our proposal:

It is suggested the definition of 15.3(ff) be changed to:

Access Broadband over Power Line (Access BPL):

A carrier current system owned or operated by an electric service provider that provides broadband communications capabilities to third parties and that transmits radio frequency energy by conduction over electric power lines above 1705 KHz and below 50 MHz for "Advanced Services". "Advanced Services" are defined in the FCC 706 Report - Availability of Advanced Telecommunications Capability. The electric power lines may be aerial (overhead) or underground up to and including the demarcation point.

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